

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**TONYA HOWARD and EBONY
JOHNSON, Each Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 1:22-cv-2817-BWJ

**TATE LEGACY INCORPORATED
and DARLENE TATE**

DEFENDANTS

PLAINTIFF'S MOTION TO REOPEN CASE

Plaintiffs Tonya Howard and Ebony Johnson, by and through their undersigned counsel, hereby submits the following for their Motion to Reopen Case:

1. The Parties reached an agreement to settle all claims alleged in this case and filed a Joint Motion for Approval of Settlement and Dismissal with Prejudice on March 19, 2024. ECF No. 85.
2. On March 25, 2024, this Court entered an Order and Judgment approving the settlement and dismissing this matter with prejudice. ECF No. 87.
3. To date, Defendants have not tendered any payments to Plaintiffs and Plaintiffs' counsel.
4. Plaintiffs now request that this Court reopen the above-styled case, for the purpose of enforcement of their agreement.
5. This request to reopen the case is made in good faith and not for reasons of delay; Defendants have not fulfilled their obligations to Plaintiffs under the settlement agreement.

WHEREFORE, Plaintiffs respectfully pray that their Motion to Reopen Case be granted, that this case be reopened for the purpose of enforcing the parties' settlement, and for all other relief the Court may find necessary or proper.

Respectfully submitted,

**TONYA HOWARD and EBONY
JOHNSON, PLAINTIFFS**

SANFORD LAW FIRM
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing was filed via the CM/ECF system, which will provide notice to the following attorney of record:

Te D. Smith
SMITH ATTORNEYS GROUP AT LAW P.C.
47 W. Polk Street, Suite 545
Chicago, Illinois 60605
Telephone: (708) 433-9138
tsmith@saglawpc.com

/s/ Josh Sanford
Josh Sanford